REMARKS

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of November 23, 2004.

Reconsideration of the Application is requested.

The Office Action

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of June 2, 2004.

Reconsideration of the Application is requested.

The Office Action

The drawings filed on February 8, 2002 have been accepted by the Examiner and entered into the file.

Claims 1, 3-5, 7, 9-11, 13, and 15-17 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0104293 filed by Armington et al. (hereinafter Armington).

Claims 2, 8, and 14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Armington in view of U.S. Patent No. 5,212,635 issued to Ferriter.

Claims 6, 12, and 18 stand objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claims 1-18 remain in this application along with new claims 19-22.

The Art Rejections

In rejecting independent claims 1, 7, and 13, it is proposed that Armington discloses a corresponding textual instruction to be applied as shown on the display and, similarly, that each displayed material also corresponds to said textual instruction. From this, it is concluded in the Office Action, that there is a bi-directional linkage between the textual instruction to be performed and the displayed video/image clip, citing Figures 6a-6c and 19-20. Applicants respectfully traverse the opinion that a bi-directional linkage is disclosed.

The bi-directional linkage recited in the claims, as amended, is described in the specification of the present application in paragraphs 18-20. For instance, paragraph 18 discloses the video-to-text portion of the bi-directional linking. As described in the paragraph, for example, a user may fast-forward or rewind the

video, and the text follows along. Paragraph 20, on the other hand, describes the text-to-video portion of the bi-directional linking where, for example, a user may select a specific step, and the video will automatically fast-forward or rewind to remain in synchronization with the text. Paragraph 19 further explains that the text and the video remain as separate objects, but the video and text objects are encoded with links to the corresponding text and video objects, respectively.

In contrast with the above-described bi-directional linking of the present application, as recited in the amended claims, Armington only teaches a means for a user to reposition the instructions, and not the video or image clips. For example, in paragraph 139, Armington teaches that the packager (user) "is provided with various control buttons 1208 located on the display 18. The control buttons 1208 include a back button 1210, a forward button 1212, a pause button 1214 and a break button 1216. The back button 1210 allows the user to backtrack to the previously displayed instruction ... The forward button 1212 allows the packager to proceed to the next step when the instruction step has been completed." The controls are further described in paragraphs 140 and 143-145, but only with reference to the packager being able to reposition the instructions.

Armington does not teach or suggest that a user can reposition the video portion, and the embodiments described by Armington can easily be accomplished with ordinary uni-directional linking even if the video/image clips and the textual instructions are separate objects. For example, if the textual instructions link to the associated graphical image, then there is no need for the graphical image to link back to the textual instructions. Further, Armington appears to be silent on the subject of linking the textual instructions to the images/videos but, rather, describes selecting an image for use with the instructions in terms of importing, selecting from pre-defined images, or scanning images (see paragraphs 97-100). The embodiments described by Armington can be accomplished by simply storing the image and textual instructions together in the same object of a plurality of linked objects, wherein the user would advance through the instructions simply by advancing through the objects, with no linking whatsoever between the textual and video objects. Armington apparently does not describe in detail how the textual instructions and the images are combined for viewing by the user using the control buttons 1208. The control buttons 1208 (including 1210-1218), therefore, as taught by Armington do not teach or suggest the bi-directional linking as recited in claims 1, 7, and 13, as amended, of the present application.

With regard to the citation of paragraph 19 and Figure 6c as a disclosure of highlighting as set forth in original claims 1, 7, and 13, Applicants respectfully traverse this opinion. Paragraph 19 of Armington is simply stating that the peripheral display and user interface shown in the figure highlight a method of identifying parts. There is no suggestion of textual highlighting in the Brief Description of the Drawings. Further the stop/finish function region 148 shown in Figure 6c is a control used by the packager to indicate that a process or packaging step is completed as described in paragraphs 65-66, rather than a textual instruction. Armington does not teach or suggest highlighting a textual instruction that is related to a linked video segment as now recited in claims 3, 4, 9, 10, and 16, as amended.

With reference to the comments, in the Office Action, regarding claims 3, 9, and 15, citing Figures 19-20, control buttons 1208, and paragraphs 72 and 74, it is asserted that Armington discloses an image/video control bar, wherein the operator may reposition a selected video object to a desired video frame. Although Armington discloses that the instructions may include video-type instructions, e.g., paragraphs 39, 50, 58, and 66, Armington does not teach or suggest that the video may be repositioned to a desired frame within the video object. The control buttons 1208 are for moving forward or backward from one set of instructions to another (paragraph 139), not to a specified frame in a video instruction. Further, paragraph 66 indicates that the only control provided to a packager over a specific instruction set is to stop or finish the step: "the display window 144 may include a video illustrating the packaging procedure with accompanying audio instructions. Once the operator clicks or otherwise activates the stop/finish region 148, the CPU 50 returns the operator to a display window" (see Figures 6c and 6a).

With reference now to the comments, in the Office Action, regarding claims 4, 10, and 17, it is asserted that Armington discloses a text selection means, wherein the video window automatically displays a video segment linked to the desired text step. It is first noted that paragraph 94 of Armington makes it clear that the new/add part window presented to the user is for the purposes of programming the instructions, rather than using the instructions. For example, "the user defines the new part by inputting a part number, a description and/or picture of the part." Secondly, paragraph 98 indicates that the user is selecting an image, e.g., "from a pre-defined library database," to be associated with the instructions, and that the user is associating the image with the instruction, e.g., "the image can be reviewed by the user before selecting the image and associating it with the instruction step

being defined." It is obvious that the image is not yet associated with the instructions and, therefore, the system could not automatically display a video segment linked to the desired text step, because the video/image has not yet been associated.

For the reasons set forth above, Applicants submit that independent claims 1, 7, and 13, as amended, and claims 2-6, 8-12, and 14-18, depending respectively therefrom, as amended, patentably define over the cited art and are, therefore, in condition for allowance. Further, Applicants submit that new claims 19-20, depending from claim 1, and new claims 21 and 22, depending respectively from claims 3 and 4, are also in condition for allowance.

CONCLUSION

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1-22) are now in condition for allowance.
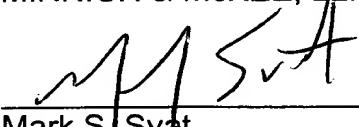
No additional fee is believed to be required for this Amendment A. However, the undersigned attorney of record hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Deposit Account No. 24-0037.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

FAY, SHARPE, FAGAN,
MINNICH & McKEE, LLP

2/23/05
Date

Mark S. Svat
Reg. No. 34,261
1100 Superior Avenue, 7th Floor
Cleveland, Ohio 44114-2579
(216) 861-5582

N:\XERZ\200418\GTY0000270V001.doc

10